IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	No. CR 05-467 le
Plaintiff,)	
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V.)	<u>INDICTMENT</u>
)	18 U.S.C. §1546(a)
BRIGIDO RENTERIA-MATEOS,)	18 U.S.C. §1028A
and FREDI A. RENTERIA-MONTES,)	42 U.S.C. §408(a)(7)(C)
)	18 U.S.C. §1028(a)(1)
)	
Defendants.)	

THE GRAND JURY CHARGES:

COUNT 1

On or about October 13, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, did obtain and possess a permanent resident card or other document prescribed by statute and regulation for entry into, or as evidence of authorized stay or employment in the United States of America, while knowing that such document was counterfeited and falsely made, to-wit: On or about October 13, 2005 JORGE ORTEGA-MENDOZA obtained and possessed a permanent resident card bearing the name of Ricardo Chong and INS A# 098-221-737 which he knew was counterfeit and falsely made; all in violation of Title 18, United States Code, Section 1546(a).

On or about October 13, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, did knowingly and unlawfully possess, without lawful authority, a means of identification of another person, to-wit: a social security number card bearing the name of Ricardo Chong and social security number XXX-XX-3920 during and in relation to a felony violation of Title 42, United States Code, Section 408(a)(7)(C), to-wit: On or about October 13, 2005, BRIGIDO RENTERIA-MATEOS did possess and sell a social security number card, purported to be issued by the Commissioner of Social Security and bearing the name of Ricardo Chong and number XXX-XX-3920; all in violation of Title 18, United States Code, Section 1028A.

COUNT 3

On or about October 13, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, in a matter within the jurisdiction of the United States Social Security Administration, did knowingly, for the purpose of obtaining anything of value from any person, sell a social security card that was purported to be issued by the Commissioner of Social Security, to-wit: On or about October 13, 2005, BRIGIDO RENTERIA-MATEOS did sell a social security number card, bearing the name of Ricardo Chong and number XXX-XX-3920; all in violation of Title 42, United States Code, Section 408(a)(7)(C).

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On or about October 13, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, did knowingly and without lawful authority produce a false United States identification document and authentication feature that is or appears to be an identification document or authentication feature issued by or under the authority of the United States, to wit, a permanent resident card bearing the name of Ricardo Chong and INS A# 098-221-737; all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(A)(I).

COUNT 5

On or about October 13, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, did knowingly and without lawful authority produce a false United States identification document and authentication feature that is or appears to be an identification document or authentication feature issued by or under the authority of the United States, to wit, a social security number card, bearing the name of Ricardo Chong and number XXX-XX-3920; all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(A)(I).

COUNT 6

Beginning on or about October 2000 and continuing to on or about October 28, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, did knowingly and without lawful authority produce more than five false United States

identification documents and authentication features that are or appear to be false identification documents or authentication features issued by or under the authority of the United States, to wit, permanent resident cards bearing the names of: Maria Ponce-Saldivar, Wilfredo Jorge-Jorge, Lorenzo Santoyo-Valdes, Silvano Reyes-Alonso, Marcelino Gonzalez-H, and Francisco Corin-Castro; all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(B).

COUNT 7

Beginning on or about October 2000 and continuing to on or about October 28, 2005, in the District of Oregon, BRIGIDO RENTERIA-MATEOS, the defendant herein, did knowingly and without lawful authority produce more than five false United States identification documents and authentication features that are or appear to be false identification documents or authentication features issued by or under the authority of the United States, to wit, social security number cards bearing the following names and numbers: Ramiro Cruz XXX-XX-3892, Fernando Reyes XXX-XX7839, Marcelino Gonzales H XXX-XX-3230, Luicia Torres XXX-XX-5263, Nadia Guizar XXX-XX-8756, Hugo Gonzalez-Garcia XXX-XX-2883; all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(B).

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On or about October 27, 2005, in the District of Oregon, FREDI A. RENTERIA-MONTES, the defendant herein, did obtain and possess a permanent resident card or other document prescribed by statute and regulation for entry into, or as evidence of authorized stay or employment in the United States of America, while knowing that such document was counterfeited and falsely made, to-wit: On or about October 27, 2005, FREDI A. RENTERIA-MONTES obtained and possessed a permanent resident card bearing the name of Guadalupe Rojas-Hernandez and INS A# 092-110-721 which he knew was counterfeit and falsely made; all in violation of Title 18, United States Code, Section 1546(a).

COUNT 9

On or about October 27, 2005, in the District of Oregon, FREDI A. RENTERIA-MONTES, the defendant herein, did knowingly and unlawfully possess, without lawful authority, a means of identification of another person, to-wit: a social security number card bearing the name of Guadalupe Rojas-Hernandez and social security number XXX-XX-8230 during and in relation to a felony violation of Title 42, United States Code, Section 408(a)(7)(C), to-wit: On or about October 27, 2005, FREDI A. RENTERIA-MONTES did possess and sell a social security card, purported to be issued by the Commissioner of Social Security and bearing the name of Guadalupe Rojas-Hernandez

and number XXX-XX-8230; all in violation of Title 18, United States Code, Section 1028A.

COUNT 10

On or about October 27, 2005, in the District of Oregon, FREDI A. RENTERIA-MONTES, the defendant herein, in a matter within the jurisdiction of the United States Social Security Administration, did knowingly, for the purpose of obtaining anything of value from any person, sell a social security card that was purported to be issued by the Commissioner of Social Security, to-wit: On or about October 27, 2005 FREDI A. RENTERIA-MONTES did sell a social security number card bearing the name of Guadalupe Rojas-Hernandez and number XXX-XX-8230; all in violation of Title 42, United States Code, Section 408(a)(7)(C).

COUNT 11

On or about October 27, 2005, in the District of Oregon, FREDI A. RENTERIA-MONTES, the defendant herein, did knowingly and without lawful authority produce a false United States identification document and authentication feature that is or appears to be an identification document or authentication feature issued by or under the authority of the United States, to wit, a permanent resident card bearing the name of Guadalupe Rojas-Hernandez and INS A# 092-110-721; all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(A)(I).

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On or about October 27, 2005, in the District of Oregon, FREDI A. RENTERIA-MONTES, the defendant herein, did knowingly and without lawful authority produce a false United States identification document that is or appears to be an identification document or authentication feature issued by or under the authority of the United States, to wit, a social security number card, bearing the name of Guadalupe Rojas-Hernandez and number XXX-XX-8230; all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(A)(I).

Dated this _____ day of November 2005.

A TRUE BILL

KARIN J. IMMERGUT

United States Attorney

KEMP L. STRICKLAND, OSB # 96118

Special Assistant United States Attorney